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MEMORANDUM

TO: Interested Parties

FROM: Hillary E. Gitelman, Environmental Review Officer

DATE: March 27, 1999

ces -- 98.902E: First and Howard; Office Development

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and review are a Notice of Preparation of an Environmental
ice that an EIR is required. These notices are required under state
l agency determines that an EIR will be prepared. They are
ncies and interested members of the public with an opportunity to
nvironmental analysis and the content of the EIR for the subject

ared, and provides further information regarding the proposed
issues that will be considered in the EIR. This document is either
view upon request from:

g Department

103

of the environmental analysis and the content of the Draft EIR should also be directed to Ms. Kugler, and should be received within 30 days after receipt of these notices. If you wish to receive a copy of the Draft EIR when it is completed, and/or further notices regarding this project, please provide us with your name and address.

These notices have been sent to community organizations and to those persons who own property abutting the site of the project. These organizations and property owners are encouraged to pass on this information to any other persons who may be interested. Please note that the environmental review process provides information on the physical environmental effects of the
and does not provide recommendations on the project itself. Other review and/or
al actions are required for the project. These actions will involve further public
ation and public hearings.

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PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street San Francisco, CA 94103-2414

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MAR 29 1999
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MEMORANDUM

TO: **Interested Parties**

FROM: **Hillary E. Gitelman, Environmental Review Officer**

DATE: **March 27, 1999**

RE: **Enclosed Notices -- 98.902E: First and Howard; Office Development**

Enclosed for your information and review are a Notice of Preparation of an Environmental Impact report (EIR) and a Notice that an EIR is required. These notices are required under state and local laws whenever a lead agency determines that an EIR will be prepared. They are intended to provide public agencies and interested members of the public with an opportunity to comment on the scope of the environmental analysis and the content of the EIR for the subject project.

An Initial Study has been prepared, and provides further information regarding the proposed project and the environmental issues that will be considered in the EIR. This document is either attached, or is available for review upon request from:

Joan A. Kugler
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103
(415) 558-6396

Comments regarding the scope of the environmental analysis and the content of the Draft EIR should also be directed to Ms. Kugler, and should be received within 30 days after receipt of these notices. If you wish to receive a copy of the Draft EIR when it is completed, and/or further notices regarding this project, please provide us with your name and address.

These notices have been sent to community organizations and to those persons who own property abutting the site of the project. These organizations and property owners are encouraged to pass on this information to any other persons who may be interested. Please note that the environmental review process provides information on the physical environmental effects of the project and does not provide recommendations on the project itself. Other review and/or approval actions are required for the project. These actions will involve further public notification and public hearings.

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PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street San Francisco, CA 94103-2414

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NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

DATE: March 27, 1999

TO: Responsible, Trustee Agencies, and Interested Parties

FROM: Planning Department
City and County of San Francisco
Office of Environmental Review
1660 Mission Street, 5th Floor
San Francisco, CA 94103-2414

RE: Notice of Preparation of a Draft Environmental Impact Report

The City and County of San Francisco Planning Department is the Lead Agency and will prepare an Environmental Impact Report for the following project:

98.902E: FIRST AND HOWARD PROJECT

The proposed project would demolish all but one of the existing structures and would construct four 9-story office buildings with a total of 1,120,000 sq. ft. of office space, and 56,000 sq. ft. of retail space devoted primarily to food services, business services, and other neighborhood-serving incidental and support uses. About 1,175 underground parking spaces would be provided. Open space would be oriented toward the First and Howard Streets intersection. 231 First Street, a Category I historic structure under Article 11 of the City Planning Code, would be preserved and renovated for restaurant or retail and office use. 401 Howard Street and 218 Fremont Street are considered eligible or potentially eligible for the National Register of Historic Places. An expanded description of the project, and a list of the potential environmental effects are included in the attached materials.

We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for the project.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but no later than 30 days after receipt of this notice. Please send your response to Joan A. Kugler, (415) 558-6396, at the San Francisco Planning Department address shown above. Please include the name of a contact person in your agency.

Hillary E. Gitelman
Environmental Review Officer

3/27/99
Date

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: March 27, 1999

Lead Agency: Planning Department, City and County of San Francisco
1660 Mission Street, 5th Floor, San Francisco, CA 94103-2414
Agency Contact Person: Joan A. Kugler, AICP **Telephone:** (415) 558-6396

Project Title: 98.902E, First and Howard
Project Sponsor: Wilson Cornerstone
Project Contact Person: Thomas Sullivan, Vice President
Telephone: (650) 358-5408

Project Address: First and Howard Streets
Assessor's Block(s) and Lot(s): 3720/5, 6, 7
3721/10, 11, 35, 88
3736/1, 2, 3A, 4, 116
3737/1, 1A, 1B, 2, 3, 4, 22, 23, 24, 25, 26
City and County: San Francisco

Project Description: The proposed project would demolish all but one of the existing structures and would construct four 9-story office buildings in the C-3-O (SD) (Downtown Office, Special Development) District. The total office area in the project would be approximately 1,120,000 sq. ft. plus about 56,000 sq. ft. of retail space devoted primarily to food services, business services, and other neighborhood-serving incidental and support uses. About 1,175 underground parking spaces would be provided, the proposed parking area would exceed 7% of the total gross floor area under the Planning Code, thereby requiring Conditional Use authorization. Open space would be oriented toward the First and Howard Streets intersection. 231 First Street, a Category I historic structure, would be preserved and renovated for restaurant or retail and office use.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal to the City Planning Commission of this Determination that an EIR is required: **April 26, 1999 at 5:00 p.m.**

An appeal requires:
1) a letter specifying the grounds for the appeal; and,
2) a $209.00 filing fee.

HILLARY E. GITELMAN
Environmental Review Officer
Planning Department

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FIRST AND HOWARD
INITIAL STUDY
98.902E

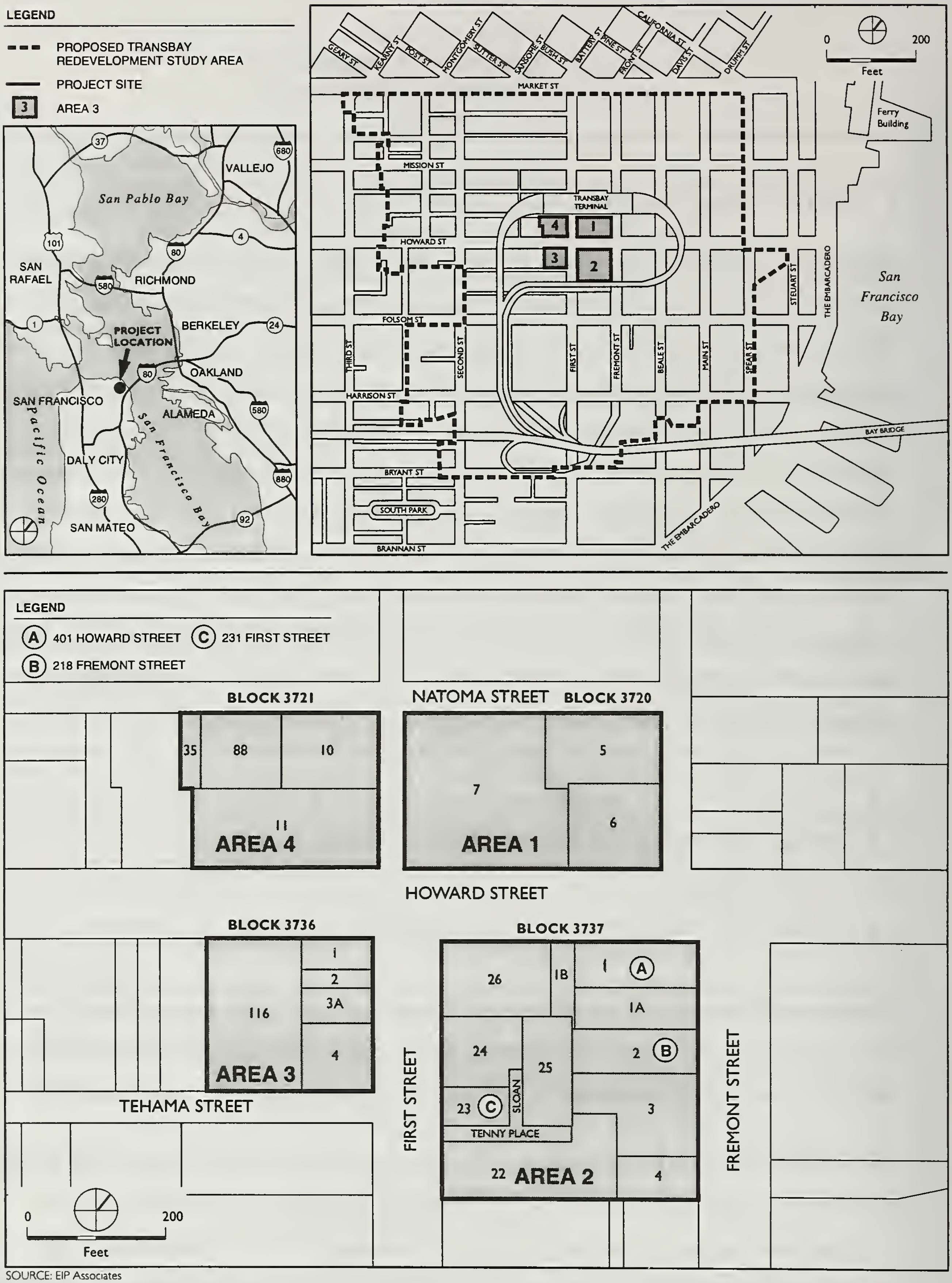
I. PROJECT DESCRIPTION

The First and Howard Streets project site lies within the proposed Transbay Redevelopment Study Area, with the Transbay Terminal immediately to the north, as shown on Figure 1. Existing uses on the site consist of a mix of office, retail, commercial, and surface parking. Buildings on the site are mostly three stories and under, with a couple of four- and five-story buildings. All existing buildings originally constructed between 1906 and 1935 would be demolished, with the exception of 231 First Street (item C on Figure 1). 231 First Street is a Category I building (a significant historical building under Article 11 of the City Planning Code). 401 Howard Street and 218 Fremont Street (items A and B on Figure 1) are considered eligible or potentially eligible, respectively, for the National Register of Historic Places. The project site is entirely within the C-3-O (Downtown Office) SD (Special Development) zoning district with a base floor area ratio (FAR) of 6:1. The project site occupies the following Assessor's Blocks and Lots:

- Block 3720: Lots 5, 6, and 7
- Block 3721: Lots 10, 11, 35, and 88
- Block 3736: Lots 1, 2, 3A, 4, and 116
- Block 3737: Lots 1, 1A, 1B, 2, 3, 4, 22, 23, 24, 25, and 26

The proposed project would occupy the four corners that make up the intersection of First and Howard Streets in the South of Market area. Starting clockwise from the northeastern corner, the four corners are referred to herein as "Area 1," "Area 2," "Area 3," and "Area 4."

The proposed project is a four-building office development that would be constructed on four parcels with an aggregate land area of approximately 184,800 sq. ft. (see Figure 2). The proposed buildings may be referred to herein as "Building 1, 2, 3, 4," respectively. The project would be designed as a master-planned urban "campus," with a consistent architectural

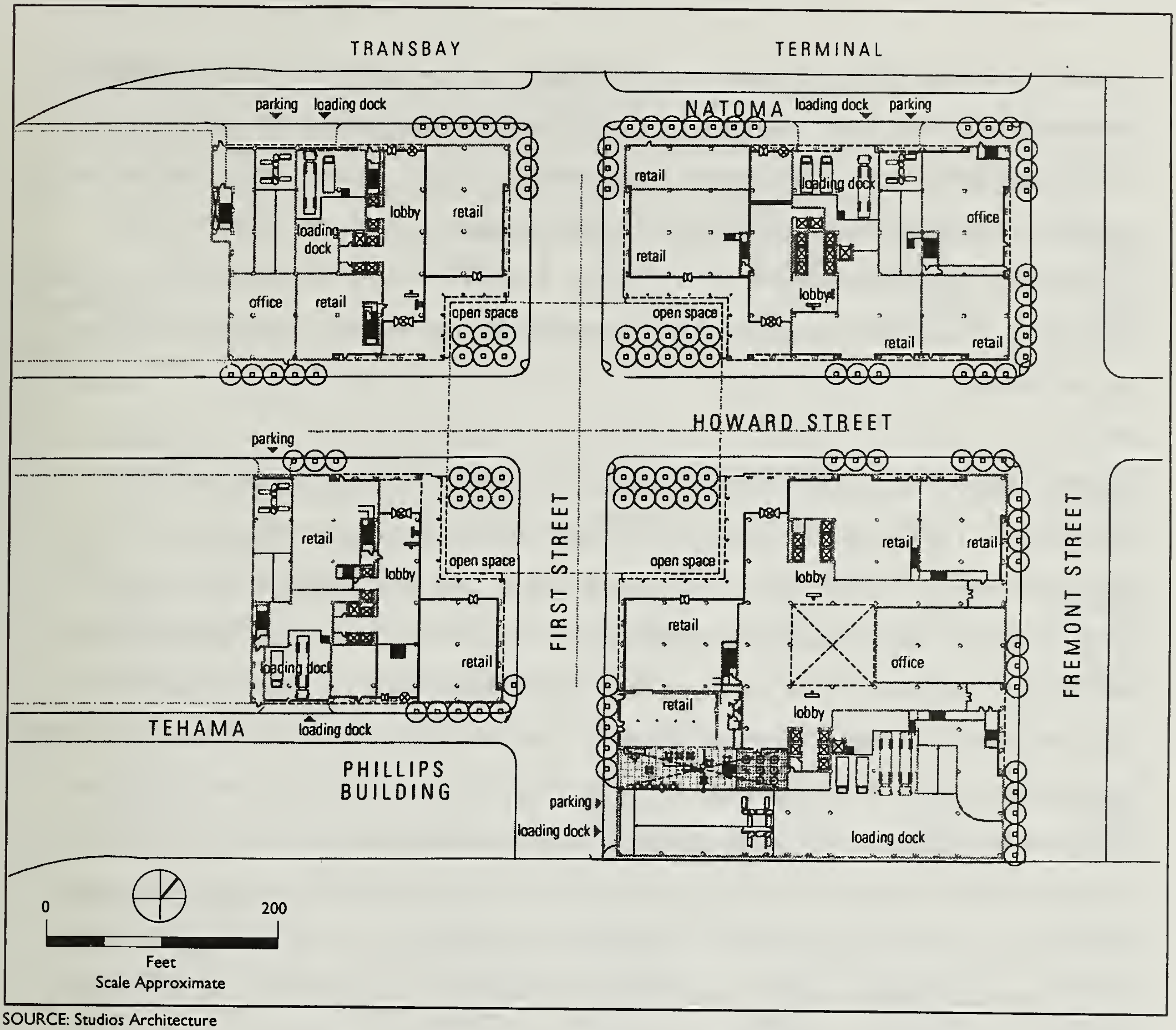


SOURCE: EIP Associates

EIP

FIRST AND HOWARD

FIGURE 1 PROJECT LOCATION



SOURCE: Studios Architecture

FIRST AND HOWARD

FIGURE 2 CONCEPTUAL PROJECT SITE PLAN

theme and identity. The buildings would be designed to meet the facility requirements of technology-intensive firms with regard to space configuration, architecture and image, and building infrastructure (for example, communications facilities, power supply, and mechanical systems). The tenant mix is anticipated to be predominantly companies in the software development, multimedia content or technology, financial services, and professional services businesses. Tenny Place and Sloan Alley are proposed to be vacated and incorporated into project Area 2.

Each building would be nine stories, or about 160 feet tall (including the mechanical penthouses). The eighth and ninth floors of each building would be set back on all sides by varying distances from the base of the building below. The total aggregate office area in the project would be approximately 1,120,000 sq. ft. In addition, there would be approximately 56,000 sq. ft. of ground-floor retail space intended for food services, business services, and other incidental and support uses (see Table 1). The building with the largest floor area would be Building 2, followed by Buildings 1, 4, and 3 (see Table 1). Building 2 would contain a courtyard in the center of the building that would be covered by a skylight at the lobby level and open above to the sky, allowing natural light to reach as much office space as possible. On Parcel 2, 231 First Street would be retained and renovated. The first floor of the 8,700-sq.-ft. building would be reused, possibly for a restaurant. The upper floors of the building would likely be reused as office space. Building 1, and possibly Building 2, would include office space in excess of the base 6:1 FAR. In the C-3-O (SD) district, buildings are permitted at FAR up to 18:1 with transferred development rights (TDR). After the project has been approved, the project would be reviewed by Planning Department staff for TDR under Planning Code Section 128.

Each building would provide two levels of on-site underground attendant and/or self-park parking, totaling about 1,200 spaces (with attendant parking). Entrances/exits to the underground parking levels for Buildings 1 and 4 would be from Natoma Street, for Building 2 from First Street, and for Building 3 from Howard Street (see Figure 2). The amount of space devoted to parking would exceed 7% of the total gross floor area of each building (ranging

TABLE 1
PROJECT SPACE ALLOTMENT

	Building (gross square feet)				
	1	2	3	4	Total
Area	45,375	75,625	29,715	34,047	184,762
Open Space	7,500	10,000	6,500	4,800	28,800
Land Use					
Office					
Project	283,000	453,700	178,300	205,000	1,120,000
Existing	53,800	19,600	24,000	88,500	185,900
Net	229,200	434,100	154,300	116,500	934,100
Retail					
Project	16,200	19,900	11,400	8,500	56,000
Existing	0	12,300	7,700	0	20.000
Net	16,200	7,600	3,700	8,500	36,000
Non-Office					
Project	0	0	0	0	0
Existing	0	62,400	0	6,700	69,100
Net	0	-62,400	0	-6,700	-69,100
Total Office + Retail					
Project	299,200	473,600	189,700	213,500	1,176,000
Existing	53,800	31,900	31,700	88,500	205,900
Net	245,400	441,700	158,000	125,000	970,100
Parking					
Area /1/	76,000	125,000	50,000	54,000	305,000
No. of Spaces /2/	325	425	200	225	1,175
Other					
Lobbies	6,000	18,200	5,000	4,900	
Loading	3,700	6,200	5,600	4,900	
Other, Subtotal	*9,700*	*24,400*	*10,600*	*9,800*	54,500

Note:

1. Excludes ramps, elevators, and stairs.
2. About 285 existing surface parking spaces would be displaced by the proposed project.

Source: Studios Architecture, 3/15/99.

from about 24% to 26%), and would require Conditional Use authorization under the Planning Code. Building 1 would provide one loading and two service vehicle spaces. Building 2 would have two loading and two service vehicle spaces, and Buildings 3 and 4 would have one loading and one service vehicle space each.

Loading dock entrances for Buildings 1 and 4 would be from Natoma Street. The loading dock entrance for Building 2 would be from First Street, and the loading dock entrance for Building 3 would be from Tehama Street (see Figure 2). Maneuvering area for Building 2 would be within the building; maneuvering area for the other buildings would be from the street.

The project would provide open space at the four corners of the First and Howard Streets intersection, consisting of an open plaza for each building, as shown on Figure 2, totaling approximately 28,800 sq. ft. (see Table 1). A portion of each plaza would be covered by an overhang created by the third floor. The open space would be designed to be pedestrian-friendly, with seating and strolling areas.

Development would occur with each Area as an individual phase, and would likely begin with Area 1 (Phase 1) by approximately mid-2000. The pace of development would be dependent on market and other factors. Construction of each building would take approximately 15 to 18 months.

The project would require: 1) review under Planning Code Section 309 for compliance with the downtown provisions of the Planning Code and for an exception to the building bulk requirements; 2) project authorization under Planning Code Section 322 for office development; and 3) Conditional Use authorization under Planning Code Sections 204.5 and 303 for parking space in excess of the maximum 7% of total gross floor area. Street vacation and a General Plan referral for the vacation of portions of Tenny Place and Sloan Alley would require review and approval by the Department of Public Works and the Board of Supervisors following a determination on conformity with the *San Francisco General Plan* by the Planning Department.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

This Initial Study examines the First and Howard project to identify its potential effects on the environment. On the basis of this study, project-specific effects that have been determined to be potentially significant relate to transportation, air quality, shadows, wind, and historic architectural resources. These issues will be analyzed in the Environmental Impact Report (EIR). Land use, business displacement, and visual quality/urban design will be discussed in the EIR for informational purposes. Topics noted “TO BE DETERMINED” mean that discussion in the EIR will enable a determination of whether or not there would be a significant impact.

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following effects of the First and Howard project have been determined to be either insignificant or to be mitigated through measures included in the project: noise, construction air quality, utilities/public services, biology, geology/topography, water, energy/natural resources, hazards, and archaeological resources. These issues are discussed below and require no further environmental analysis in the EIR.

III. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

		Not Applicable	Discussed
1.	Discuss any variances, special authorizations, changes proposed to the City Planning Code or Zoning Map, if applicable.		X
2.	Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable.	X	X

The First and Howard project would require review by the Planning Commission, the Department of Public Works, and the Board of Supervisors in context of the *San Francisco General Plan* and other relevant plans. Applicable Area Plans and Elements of the *General Plan* include the Downtown Plan, the Urban Design Element, the Commerce and Industry Element, and the Rincon Hill Plan. If the project, on balance, were to have substantial conflicts with *General Plan* objectives and policies, it could not be approved.

Plans and Policies will be discussed in the EIR for informational purposes. The EIR will also address the status and probable outcome of Transbay Area planning with the focus on Transbay Terminal location, potential Caltrain extension, proposals for open space and pedestrian networks, and possible rezoning or adoption of a Redevelopment Plan to achieve Transbay Area goals. A brief summary of relevant *General Plan* policies, applicable Zoning Map and Planning Code provisions, street vacation procedures, and discussion of Transferable Development Rights will also be included.

B. ENVIRONMENTAL EFFECTS

Except for the categories of transportation, air quality, shadows, wind, and historic architectural resources as noted above, all items on the Initial Study checklist incorporated herein have been checked “No,” indicating that, upon evaluation, staff has determined that the proposed project could not have a significant adverse effect in those areas. Several checklist items have also been checked “Discussed,” indicating that the text includes discussion of that particular issue. For all of the items checked “No” without discussion, the conclusions regarding potential adverse environmental effects are based on field observation, staff and consultant experience on similar projects, and/or standard reference materials available within the Planning Department such as the Department’s Transportation Guidelines for Environmental Review, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

	Yes	No	Discussed
1. Land Use - Would the project:			
a. Disrupt or divide the physical arrangement of an established community?	___	X	X
b. Have any substantial impact upon the existing character of the vicinity?	___	X	X

As noted in the project description, the project site is located between Natoma, Second, Tehama, and Fremont Streets and includes the four corners of the intersection of First and Howard Streets in the Transbay Redevelopment Study Area of San Francisco. This area transitions from high-intensity office use in the Financial District to mixed low-rise commercial uses in the South of Market area. The project site is adjacent to the Transbay Terminal, a structure of local and regional significance; the three-block-long terminal, plus ramps and loops, is used by AC Transit East Bay bus service and Greyhound bus lines. Located within the Transbay Transit Terminal loop which connects to the Bay Bridge to the south, the project site is less intensely developed than nearby areas outside the existing terminal loop and ramps. Existing land uses at the site include warehouse, office, retail outlet, and surface parking. Existing buildings on the project site are less than six stories; most are two- to three-story buildings.

The proposed project would be characterized by office uses with ground-floor retail and subsurface parking, generally consistent with land uses and building heights in the project vicinity. Displacement of existing businesses occupying some buildings on site would occur as a result of demolition associated with the project. The project would extend the Financial District further into the South of Market area, as envisioned in the Downtown Plan in designating the area east of Yerba Buena Center and north of Folsom Street by a Special Development District in the Downtown (C-3-O (SD)).

Overall, the project would be consistent with existing and planned land uses in the vicinity and would not have a substantial adverse effect on land use. However, land use, including additional information on business displacement, will be discussed in the EIR for informational purposes.

2. Visual Quality - Would the project:	Yes	No	Discussed
a. Have a substantial, demonstrable negative aesthetic effect?		X	X
b. Substantially degrade or obstruct any scenic view or vista now observed from public areas?		X	X
c. Generate obtrusive light or glare substantially impacting other properties?		X	X

The project site is adjacent to the Transbay Terminal, new office tower development, and mixed-use low-rise commercial structures in the Transbay Area. The project would replace older, low-scale retail, office, and warehouse buildings and surface parking with mid-rise (four to seven stories) to high-rise (about seven stories) office-type structures up to nine stories tall and subsurface parking. 231 First Street, a Category I Significant Building, would be renovated and would be incorporated into the design of Building 2 as part of the project. The proposed project would increase the scale of development on the project site; the height and bulk of the proposed buildings would be similar to or less than that of other development in the nearby Financial District. The Transbay Redevelopment Study Area includes a mix of new high-rise office structures and older, generally low-scale warehouse, office, and retail buildings. The project would be taller than existing buildings on the site, but shorter than some structures nearby such as the roughly 25-story 100 First Street Delta Tower at Mission Street, and the under-construction 199 Fremont Street building, a 25-story office tower adjacent to the project site. Views of the project site from First Street, from Howard Street, from the nearby Transbay Terminal on Mission Street, and from certain freeway locations would be altered with views of project buildings. The project would not substantially change existing views from public open space, such as The Embarcadero Promenade. Long-range views of the project, such as those from Twin Peaks or Potrero Hill, would be part of overall views of Downtown and would be limited by existing high-rise buildings.

The project would not have substantial adverse effects on views from public open space or from other locations. However, for informational purposes and to assist in the understanding of the project, the EIR will discuss visual quality and urban design and will provide several photomontages of the proposed buildings in context of surrounding structures.

3. Population - Would the project:	Yes	No	Discussed
a. Induce substantial growth or concentration of population?		X	X
b. Displace a large number of people (involving either housing or employment)?		X	X
c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?		X	X

The proposed project would demolish a total of 266,300 square feet of existing office, retail, and other commercial space/1/, while renovating 8,700 square feet of existing retail and office space for ground-floor restaurant/retail use and upper-story offices. The project would not construct housing nor would it displace existing housing. Demolition of existing buildings on site would displace approximately nine existing businesses and about 730 employees (or 0.14% of the City's 534,600 employees existing in 1995). Space at the site is not now fully used./2/ Displaced businesses would include the "Fritzi of California" clothing manufacturer. These businesses and employees would be expected to relocate within San Francisco or elsewhere in the Bay area. Fritzi has stated that they will remain in San Francisco./3/ Kellwood Company recently acquired Fritzi of California and stated at the time of acquisition that all existing Fritzi employees would be retained in the existing facilities through 1999./4/ Business displacement within the City is an economic impact that would not be a significant environmental impact under CEQA.

The proposed project would be expected to add approximately 4,200 employees to San Francisco's economy for a net increase of 3,500 employees after adjusting for existing employment/5/ (an increase of 0.7% over the City's 535,000 existing employees)./6/ This increase in employment would be about 0.5% of total employment projected for San Francisco in year 2015 (673,500 employees), and it would be about 2.5% of projected employment growth from 1995-2015 (138,500 jobs)./7/ This potential increase in employment would be small in the context of total employment in San Francisco.

Increases in a city's employment in turn increase demand for local housing. San Francisco is the central city (and most urban place) in an attractive region. The San Francisco Bay Area is known for its agreeable climate, open space, recreational opportunities, cultural amenities, a strong and diverse economy, and prominent educational institutions. As a regional employment center, San Francisco attracts people who want to live close to where they work. These factors continue to support a strong demand for housing in San Francisco. Providing new housing to meet this strong demand is particularly difficult because the amount of land available is limited and because land and development costs are relatively high. For these reasons, San Francisco consistently ranks as one of the most expensive housing markets in the United States.

The proposed project would not create a substantial demand for new housing. Using the City's proposed updated Office Affordable Housing Production Program (OAHPP) methodology, the project would create about 1,200 new San Francisco households in total, of which about 1,180 would be related to office employment./8/ The proposed methodology is used since it more accurately estimates current housing demand. These households would increase total San Francisco households in 1995 (311,430 households) less than one-half percent (0.4%)./9/ They would be less than one-half percent (0.34%) of total households forecast for year 2015 (343,750 households) and they would be 3.7% of the household growth forecast between 1995 and 2015 (32,320 households)./10/ Project-related housing demand would be less than these levels if a greater-than-usual percentage of the proposed project's new employees were already employed elsewhere and were residents of San Francisco.

Housing demand from a single development project, in and of itself, is not a physical environmental effect under CEQA. Under current requirements of Section 313 of the San Francisco Planning Code, the Office Affordable Housing Production Program (OAHPP), the project sponsor would be required to contribute to affordable housing production in San Francisco, either by directly constructing housing or by paying an in-lieu fee of approximately $6.6 million./11/ Complying with OAHPP is the manner in which San Francisco typically addresses housing demand effects from individual office development projects.

Based on the above analysis, no significant physical environmental effects on housing demand or population would occur, and these issues require no further analysis in the EIR. However, for informational purposes the EIR will discuss business displacement associated with the proposed projects under the land use section of the EIR.

NOTES: Population

1. The demolition would include 185,900 gsf of office space, 11,300 (20,000 total minus the 8,700 gsf renovation) gsf of retail space, and 69,100 gsf of other commercial space.

2. Employee displacement estimate based on total square footage of existing occupied space and on average office employee density factors of 275 sq. ft. per employee (conservative capacity estimate assuming 0% vacancy) and 350 sq. ft. per employee for retail and 590 sq. ft. per employee for other commercial (warehouse) space. Sources: City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, Volume III, p. C.4, Table C.6, Density Factors and Assumptions for Estimating Employment for the Proposed Project (from Final Mission Bay EIR, 1990, Volume III, Appendices, p. XIV.A.10, Table XIV.A.2, Density Factors and Assumptions for Estimating Project Area Employment). Also consistent with Keyser Marston Associates, Inc., *San Francisco Cumulative Growth Scenario, Final Technical Memorandum,* prepared for the San Francisco Redevelopment Agency, August 27, 1997, revised March 30, 1998, see p. 40, Table 6, South of Market Employment Projection, Cumulative Growth Analysis, City of San Francisco 1995-2015.

3. Tom Sullivan, Vice President, Development, Wilson Cornerstone, personal communication, February 2, 1999, to EIP Associates.

4. Tom Sullivan, Vice President, Development, Wilson Cornerstone, personal communication, February 2, 1999, to EIP Associates.

5. Employee estimate for the proposed project's 1,120,000 gsf of new office space and 56,000 gsf of new retail (including the 8,700 gsf of renovated existing retail and office) based on average employee density factors of 275 sq. ft. per office employee (conservative capacity estimate assuming 0% vacancy) and 350 sq. ft. per employee for retail space. Sources: City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, Volume III, p. C.4, Table C.6, Density Factors and Assumptions for Estimating Employment for the Proposed Project (from Final Mission Bay EIR, 1990, Volume III, Appendices, p. XIV.A.10, Table XIV.A.2, Density Factors and Assumptions for Estimating Project Area Employment). See also Note 1.

6. City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, Volume I, p. V.C.38, Table V.C.8, Mission Bay Project Area and Rest of City Employment 1995 and 2015. Mission Bay Project Area employment estimates prepared added to "Rest of City" estimates prepared by Keyser Marston Associates, Inc., *San Francisco Cumulative Growth Scenario, Final Technical Memorandum,* prepared for the San Francisco Redevelopment Agency, August 27, 1998, revised March 30, 1998.

7. City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, Volume I, p. V.C.38, Table V.C.8, Mission Bay Project Area and Rest of City Employment 1995 and 2015. Mission Bay Project Area employment estimates prepared added to "Rest of City" estimates prepared by Keyser Marston Associates, Inc., *San Francisco Cumulative Growth Scenario, Final Technical Memorandum,* prepared for the San Francisco Redevelopment Agency, August 27, 1998, revised March 30, 1998.

8. Total project employment at buildout minus existing employment capacity on site. The methodology of the Office Affordable Housing Production Program Ordinance (City and County of San Francisco Planning Code, Section 313) applies only to office development. However, the methodology is used in this Initial Study (as it has in other recent environmental assessments such as the Mission Bay SEIR) to approximately estimate total demand for housing associated with total project employment for informational purposes. Households associated only with office employment are also stated in this Initial Study. To more accurately estimate housing demand for today's socioeconomic conditions, the proposed updated assumptions include 55% of new employees will live in the City in households with an average of 1.6 workers per household (City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, September 1998, Volume IV, Appendix C, p. C.8, Table C.8, Jobs/Housing Analysis for the Proposed Project).

9. City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, Volume I, p. V.C.39, Table V.C.9, Mission Bay Project Area and Rest of City Households, Population, and Employed Residents, 1995 and 2015. Mission Bay Project Area estimates added to "Rest of City" estimates prepared by Keyser Marston Associates, Inc., *San Francisco Cumulative Growth Scenario, Final Technical Memorandum,* prepared for the San Francisco Redevelopment Agency, August 27, 1998, revised March 30, 1998.

10. City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency, *Mission Bay Subsequent EIR*, SCH No. 97092068, Volume I, p. V.C.39, Table V.C.9, Mission Bay Project Area and Rest of City Households, Population, and Employed Residents, 1995 and 2015. Mission Bay Project Area estimates added to "Rest of City" estimates prepared by Keyser Marston Associates, Inc., *San Francisco Cumulative Growth Scenario, Final Technical Memorandum,* prepared for the San Francisco Redevelopment Agency, August 27, 1998, revised March 30, 1998.

11. Based on 934,100 square feet of net new gross square footage of office space (see Note 5 and Note 1). City and County of San Francisco Planning Code, Section 313 of the Office Affordable Housing Production Program Ordinance applies only to office development. Section 313 contains provisions and procedures for determining the exact gross square footage to which the in-lieu fee payment factor would be applied, as well as for increasing the fee to keep pace with inflation. The present fee is $7.05 per square foot of office space. As such, the fee estimate in this Initial Study is approximate, with the Planning Department determining the precise fee at a subsequent in the project approval process. Section 313.6 describes the in-lieu fee payment calculation.

4. Transportation/Circulation - Would the project:	Yes	No	Discussed
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	To Be Determined		
b. Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	To Be Determined		
c. Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	To Be Determined		
d. Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	To Be Determined		

Increased employment at the project site would place increased demands on the local transportation system, including increased traffic, transit demand, and parking demand. The EIR will discuss project effects related to transportation and circulation, including intersection operations, transit demand, and impacts on pedestrian circulation, parking, bicycles, and freight loading, as well as construction impacts. The analysis will take into account the planned Bay Bridge retrofit construction activities and the potential development occurring in the Transbay Redevelopment Study Area.

	Yes	No	Discussed
5. Noise - Would the project:			
a. Increase substantially the ambient noise levels for adjoining areas?	___	X	X
b. Violate Title 24 Noise Insulation Standards, if applicable?	___	X	X
c. Be substantially impacted by existing noise levels?	___	X	X

Outdoor noise in the vicinity of the project area includes numerous potential sources of noise. The most significant existing source of noise throughout most of San Francisco is traffic. This is especially true in the project area because of the proximity of the Interstate 80 and Bay Bridge connection routes and the Transbay Transit Terminal bus ramps. Non-traffic noise sources in this area would include construction noise due to other projects in the vicinity such as the Interstate 80 freeway ramps and the Bay Bridge retrofit. The nearest sensitive receptors to the project area would be isolated residential uses, including developments south of Folsom Street.

Effects on Ambient Noise Levels

Construction Noise and Vibration. Construction activities from the project could potentially include pile driving, excavation and hauling, erection, and finishing. Construction activities would be temporary and intermittent and would occur at different times through the phases of project construction. Because each building would likely be constructed consecutively, not concurrently, the construction period could extend to more than five years. For each major phase of development, approximately 1 month would be devoted to demolition, 2 months to excavation, and 12 months for erection and finishing. Demolition and pile driving would be most likely to cause temporary, substantial increases in noise and would be expected to occur for a duration of approximately one to three months for each building.

Construction of other nearby projects, such as the Interstate 80 freeway ramps and the Bay Bridge retrofit that coincide with construction of the proposed development would temporarily increase the overall noise levels in the immediate vicinity of construction activities, as the noise intensity would be greater with a larger number of noise sources.

Noise impacts from construction activities could be reduced in at least three different ways: reduce the sound level at the source, provide the receiver with shielding, and alter the path of sound transmission. To minimize noise and vibration from pile driving, the project sponsor would require project construction contractors to predrill holes to the maximum depth feasible on the basis of soil conditions. Contractors would be required to use construction equipment with state-of-the-art noise shielding and muffling devices. The project sponsor would also require that contractors limit pile driving activity to times of the day that would be consistent with the Noise Ordinance. See Mitigation Measures p. 46.

Construction activities at all projects in the area, including the proposed development, would be conducted in compliance with the San Francisco Noise Ordinance (Article 29, San Francisco Police Code). The ordinance requires that noise levels from individual pieces of construction equipment other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Noise Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works. Project demolition and construction would comply with the Noise Ordinance. Compliance with the Noise Ordinance is required by law and would reduce any impacts to a less-than-significant level.

Construction activities for the proposed project would generate ground-borne vibration with the environmental noise discussed above. Vibration impacts caused by construction activities vary depending on source, path, and receiver factors. Pile driving is potentially the greatest source of vibration generated from construction activities. Characteristics of the vibration path, or "path factors," are the geologic and structural conditions that the vibration could travel through, including the soil type, depth to bedrock, and building type. The building type is also a vibration receiver factor. Vibration generally reduces as it propagates throughout a building, but resonances within the building structure may also amplify the vibration. In the absence of construction equipment type and operational details, site-specific soil vibration data, building design, and receptor location information, the impacts of construction-related vibration which would be caused by construction are difficult to quantify. Because the pile driving activities would be temporary and intermittent, and the project sponsor would require contractors to schedule pile driving to minimize disturbance to neighbors (see Mitigation Measures p. 46), it is reasonable to assume that potential vibration impacts would be reduced to a less-than-significant level.

Based on the above analysis, no further analysis of construction noise or vibration will be presented in the EIR.

Traffic Noise. Ambient noise levels in the vicinity of the project are typical of noise levels in urban San Francisco. The ambient noise is dominated by vehicular traffic, including trucks, cars, buses, and emergency vehicles. Generally, traffic must double in volume to produce a noticeable increase in noise levels. Traffic volumes would not be expected to double as a result of the project; therefore, substantial increases in traffic noise levels would not be anticipated in the project area. Traffic noise will not be analyzed further in the EIR.

Building Equipment Noise. The proposed project would include mechanical equipment, such as air conditioning units and chillers, which could produce operational noise. These operations would be subject to the San Francisco Noise Ordinance, Article 29 of the San Francisco Police Code. Compliance with Article 29, Section 2909, would limit noise from building operations, and substantial increases in the ambient noise level due to building equipment noise would not be anticipated. Therefore, the EIR will not discuss building equipment noise further.

Interior Noise and Existing Noise Levels

No residential uses would be included with the proposed development. The noise insulation requirements of Title 24 of the California Code of Regulations apply to residential occupancies. Although some level of noise insulation would be provided in the proposed project, the standards of Title 24 would not be applicable.

The existing background noise levels in the project area are typical of noise levels in urban San Francisco. This existing noise would be occasionally noticeable within the proposed buildings and would dominate the noise environment of the proposed project's open space. Because the proposed development does not include new noise sensitive uses, the existing noise environment would not negatively affect occupant use. Based on this information, the effect of existing noise levels on the proposed development will not require further analysis in the EIR.

6. Air Quality/Climate - Would the project:		Yes	No	Discussed
a.	Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	To Be Determined		
b.	Expose sensitive receptors to substantial pollutant concentrations?	To Be Determined		
c.	Permeate its vicinity with objectionable odors?		X	X
d.	Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	To Be Determined		

Effects on Ambient Air Quality

Construction Emissions. During construction, air quality could potentially be affected for short periods. Excavation and movement of heavy equipment could create fugitive dust and emit criteria pollutants as a result of diesel fuel combustion. The criteria pollutants or precursors to criteria pollutants are: nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO_2), hydrocarbons (HC), and particulate matter with a diameter of less than 10 microns (PM_{10}). Fugitive dust is made up of particulate matter including PM_{10}.

Construction emissions would occur in short term and temporary phases for each parcel, but they could still cause adverse effects on local air quality. The Bay Area Air Quality Management District (BAAQMD), in its CEQA Guidelines, has developed an analytical approach that obviates the need to quantitatively estimate these emissions. Instead, BAAQMD has identified a set of feasible PM_{10} control measures for construction activities. The project includes these measures (see p. 46) to reduce the effects of construction activities to an insignificant level. San Francisco Ordinance 175-91, adopted by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, contractors would obtain reclaimed water from the San Francisco Clean Water Program. Because the project would include these mitigation measures, it would not cause significant construction-related air quality effects. Therefore, the EIR will not address these effects further.

Traffic Emissions. Potential air quality impacts from the proposed project could occur due to increased traffic throughout the region. Region-wide emissions will be assessed in the EIR and compared to the BAAQMD's significance thresholds for regional impacts. Also of concern are CO emissions and the possibility of exceeding CO standards at congested intersections and nearby sensitive receptors. The impact of vehicular CO emissions on local ambient air quality will be assessed in the EIR. CO concentrations will be estimated for existing, future-without-project, and future-with-project conditions. The results of the analysis will be compared to state and federal ambient air quality standards to evaluate impacts.

Exposure to Toxic Air Contaminant Emissions/Objectionable Odors

The proposed project includes new office-space, new retail, and new parking areas. These uses could require operation of natural gas fired boilers or chillers that could emit trace quantities of toxic air contaminants, but they are not expected to have the potential to generate toxic air contaminants in substantial amounts or any objectionable odors. Therefore, the EIR will not discuss this issue further.

Wind Effects

In order to provide a comfortable wind environment for people in San Francisco, the City established specific comfort criteria to be used in the evaluation of proposed buildings in certain areas of the City. The City Planning Code sets forth wind criteria for the proposed project, which is in a C-3 District. Section 148(a) establishes comfort criteria of 11 miles per hour (mph) equivalent wind speed for pedestrians and 7 mph for seating areas, not to be exceeded more than 10% of the time, year-round, between 7:00 a.m. and 6:00 p.m. Winds that reach or exceed 26 mph for a single hour are defined in the Planning Code as hazardous. Developments that would cause wind conditions to exceed the hazardous wind criterion for more than a single hour per year are also restricted in C-3 Districts. The EIR will analyze the project's effects in regard to existing wind conditions. A wind tunnel test will be performed and the effects of the project and the alternatives will be compared to the applicable criteria.

Shadow Effects

City Planning Code Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission, in consultation with the Recreation and Park Commission, finds the impact to be insignificant. In the project vicinity, Justin Hermann Plaza, five blocks northeast, would be subject to Section 295. On the basis of review of preliminary shadow information, the project would not shade areas subject to Section 295./1/ The proposed project could increase shadows on other open space and sidewalks in the vicinity; therefore, a shadow study will be completed and the EIR will discuss its results.

NOTES: Air Quality/Climate

1. The preliminary shadow analysis documenting Section 295 information is on file and available for public review at the Planning Department, 1660 Mission Street.

	Yes	No	Discussed
7. Utilities/Public Services - Would the project:			
a. Breach published national, state or local standards relating to solid waste or litter control?	___	X	X
b. Extend a sewer trunk line with capacity to serve new development?	___	X	X
c. Substantially increase demand for schools, recreation or other public facilities?	___	X	X
d. Require major expansion of power, water, or communications facilities?	___	X	X

Solid Waste

San Francisco's solid waste is disposed of at the Altamont Landfill. A substantial expansion of the landfill was approved in 1997; therefore, the landfill will be able to accommodate San Francisco's solid waste stream well into the future. The solid waste associated with project construction and operation would not substantially affect the foreseeable life of the Altamont Landfill; therefore, the EIR will not further discuss the issue of solid waste generation.

Sewer and Wastewater Treatment Plant Capacity

The site is served by San Francisco's combined sewer system, which handles both sewage and storm water runoff. No new sewer construction would be needed because the project site is already adequately served by sewer infrastructure. Sewers in First and Howard Streets are 3-foot-by-5-foot brick sewers (approximately equivalent to 27-inch to 30-inch sewer lines), and there is a 12-inch sewer line along Fremont Street./1/ New connections would be made from the project buildings to these sewer lines, but no sewer trunk lines with capacity to serve new development are proposed.

Wastewater treatment is provided primarily by the Southeast Water Pollution Control Plant. The project would meet any wastewater pretreatment requirements of the San Francisco Public Utilities Commission, as required by the San Francisco Industrial Waste Ordinance./2/ In addition, the San Francisco Public Utilities Commission's 1998 Bayside Cumulative Impact Analysis identified four major foreseeable development projects in the east half of the City that could have a measurable effect on the volume of discharges from the sewer system. The First and Howard project was not identified as one of those projects. Furthermore, the project would have little effect on the total wastewater volume discharged through the combined sewer system, particularly since storm water runoff contributes greatly to the total flow and the site is already paved (resulting in maximum storm water flows). For these reasons, the EIR will not evaluate demands on wastewater treatment facilities further.

Public Services

The Downtown Area Plan of the *San Francisco General Plan* includes the project site. The Downtown Plan EIR evaluates the demand for public services and utilities serving Downtown. This analysis remains the best available source of information regarding the general nature of the growth anticipated for the area in the future, and the project would fall within the development forecast for Downtown. The Downtown Plan EIR concluded that the demand for utilities and public services resulting from growth in the C-3 districts would not be significant. The project, in particular, would increase demands relatively little when considered within the context of the greater Downtown area, which is already densely developed.

Police and Fire Protection. The project site presently receives police and fire protection services, and the project would create little additional demand for fire and police services in the area. Although the project could increase the number of calls received from the area or the level of regulatory oversight that must be provided as a result of the increased concentration of activity on-site, the increase in responsibilities would not likely be substantial in light of the existing demand for police and fire protection services in Downtown. Furthermore, the increase in demand would not require the construction of any new police of fire prevention facilities. For these reasons, the EIR will not discuss further police or fire protection services.

Power and Communications Facilities

The project site is already served by power utilities and communication facilities. The new buildings would require typical utility connections and could tap into existing power and communications grids. Tenants who may need additional communications facilities, such as fiber optic connections, would need to arrange independently for such connections.
The project would vacate portions of Tenny Place and Sloan Alley on Area 2, and would cover them with the proposed building. The area underneath Tenny Place and Sloan Alley would be part of the proposed underground parking garage. Vacation of these rights-of-way and construction underneath them would require relocation of any water, sewer, electrical, natural gas and telecommunication lines serving adjoining property. Any relocation would be completed without interruption of service to adjacent properties. Therefore, no new power or communications facilities would be necessary as a result of project implementation, and the EIR will not discuss this issue further.

Water Supply Facilities

The project would consume about 175,000 gallons of water per day, which would be about 135,000 gallons per day more than the estimated current consumption of 40,000 gallons per day on the project site. This would incrementally increase the demand for water in San Francisco. However, the new construction would be designed to incorporate water-conserving measures, such as installing low-flush toilets and urinals, as required by California State Building Code section 402.0(c). It is expected that the San Francisco Water Department would provide sufficient water to meet the needs of the project.

In addition, it is expected that the project would use less potable water in the future when the City's reclaimed water system comes on line. The project site is within the Eastside Reclaimed Water Use Area designated by Section 1029 of the Reclaimed Water Use Ordinance (approved November 7, 1991), which added Article 22 to Part II, Chapter X of the *San Francisco Municipal Code (Public Works Code)*. Under this Ordinance, non-residential projects over 40,000 sq. ft. that require a site permit, building permit, or other authorization, and are located within the defined area, must provide for the construction and operation of a reclaimed water system for the transmission of the reclaimed water within buildings and structures or otherwise demonstrate the ability to retrofit the building when the City builds its reclaimed water system. To comply with the Ordinance, the building would be designed with separate plumbing to service uses (*e.g.*, toilets and urinals) that could employ reclaimed water.

Because the project would not result in a substantial increase in water use, it would not result in a significant impact, and therefore, the EIR will not discuss water supply facilities further.

NOTES: Utilities/Public Services

1. Gene Handa, Hydraulic Engineering Section, Bureau of Engineering, Department of Public Works, telephone communication with EIP Associates, January 27, 1999.

2. City and County of San Francisco, Ordinance No. 19-92, San Francisco Municipal Code (Public Works), Part II, Chapter X, Article 4.1 (amended), January 13, 1992.

8. Biology - Would the project:	Yes	No	Discussed
a. Substantially affect a rare or endangered species of animal or plant, or the habitat of the species?	___	X	X
b. Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	___	X	X
c. Require removal of substantial numbers of mature, scenic trees?	___	X	X

No known rare, threatened or endangered species are known to exist in the vicinity. The proposed project site is in a developed urban area and is completely covered by structures and impervious surfaces. Development of the site would not affect, or substantially diminish, plant or animal habitats. The project would not interfere with any resident or migratory species. The open space proposed as part of the project would include plants and street trees appropriate for the urban landscape of the project site. Therefore, this topic will not be discussed in the EIR.

9. Geology/Topography - Would the project:	Yes	No	Discussed
a. Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?		X	X
b. Change substantially the topography or any unique geologic or physical features of the site?		X	X

Geologic Hazards

The Community Safety Element of the *San Francisco General Plan* contains maps that show areas subject to geologic hazards. The project site is located in an area that would be subject to "non-structural to moderate" damage (Modified Mercalli Intensity VII to VIII) from seismic groundshaking originated by a characteristic earthquake (Moment Magnitude 7.1) along the San Andreas fault, approximately 6 miles southwest of San Francisco, and Northern Hayward fault, approximately 12 miles northeast of San Francisco (Maps 2 and 3 in the Community Safety Element). The project site also is in an area of liquefaction potential (Map 4 in the Community Safety Element), a Seismic Hazards Study Zone designated by the California Division of Mines and Geology. The project site is not in an area subject to landslide, seiche or tsunami run-up, or reservoir inundation hazards (Maps 5, 6 and 7 in the Community Safety Element)./1/ The project site is not located in an Alquist-Priolo Earthquake Fault Zone./2/

In its review of the building permit application for a development proposal in an area of liquefaction potential, the Department of Building Inspection would require the project sponsor to prepare geotechnical reports to assess the nature and severity of the hazards at the site and to recommend project design and construction features that would reduce those hazards. One or more geotechnical (foundation) investigations for each of the four major phases of the project by a California-licensed geotechnical engineer would be included as part of the project. The project sponsor and its contractors would follow the recommendations of the final geotechnical reports regarding any excavation and construction for the project, including the types of foundations necessary to support various project elements. To ensure compliance with all current San Francisco Building Code provisions regarding structural safety, the Department of Building Inspection would review the geotechnical report and building plans for the proposed project, and determine the necessary engineering and design features to reduce potential damage to structures caused by groundshaking and liquefaction. In this way, amelioration of potential damage to structures from geologic hazards at the project site would be ensured through the Department of Building Inspection requirement for a geotechnical report and review of the building permit application.

The project site is about 21 feet above sea level. The ground surface in the project area slopes down to the northeast toward San Francisco Bay, and the project site currently is covered by one- to five-story brick and concrete buildings (some with and some without basements), and paved parking lots. Phase I Environmental Site Assessments completed in 1998 by Treadwell & Rollo/3/ and Erler & Kalinowski, Inc./4/ for various structures on the project site indicate the site is underlain by unengineered fill material (sand, brick, rubble, etc.) placed in the area during the general filling of the San Francisco waterfront during the 1850s. Thickness of the fill reported at the site ranges from 5 feet to 15 feet, depending on the location sampled. Beneath the fill is fine-grained beach or dune sand to a depth of at least 22 feet below the ground surface. Bay mud was encountered at a nearby site at a depth of about 40 feet below the ground surface. Earlier investigations in the area indicate the Franciscan bedrock (sandstone and shale) is about 185 feet below the ground surface./5/ Groundwater was encountered in the 1998 investigations at depths between 10 and 20 feet below the ground surface.

Because of the composition of the subsurface material at the site, it is probable that at least some of the structures proposed for the site would need pile foundations. Pile driving also is discussed in this Initial Study as a noise issue (see pp. 16-18). A measure to reduce the noise of pile driving is presented on p. 46.

Because of the shallow nature of the water table, it is likely that at least some of the excavations for the proposed structures would need dewatering. The First and Howard project includes mitigation measures (see pp. 46 - 47) to reduce the potential settlement effects of dewatering on nearby streets and properties.

Topography/Unique Geologic Features

The proposed project would not alter the topography of the site, or otherwise affect any unique geologic or physical features of the site.

Based on the above discussion, no further analysis of geology and seismicity or topography is required in the EIR.

NOTES: Geology/Topography

1. City and County of San Francisco, *Community Safety Element, San Francisco General Plan*, April 1997.

2. California Division of Mines and Geology, *Fault-Rupture Hazard Zones in California, Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps,* Special Publication 42, revised 1997, Figure 4B.

3. (a) Treadwell & Rollo, Inc., *Phase I Environmental Site Assessment, Site 2, 204, 210, and 228 First Street, 501 and 509 Howard Street, San Francisco, California*, March 12, 1998.

   (b) Treadwell & Rollo, Inc., *Phase I Environmental Site Assessment, Site 1, 35 and 39 Natoma Street, 168 First Street, 500 and 546 Howard Street, San Francisco, California*, March 18, 1998.

   (c) Treadwell & Rollo, Inc., *Phase I Environmental Site Assessment, Site 6, 172 Fremont Street, 400 Howard Street, San Francisco, California*, March 19, 1998.

4. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999.

5. (a) Harding Lawson Associates, *Remedial Action Plan, Removal of Hazardous Waste during Foundation Excavation, 301 Howard Street, San Francisco, California*, March 27, 1985, cited in Erler & Kalinowski, Inc., 1999.

   (b) Schlocker, J.C., *Geology of the San Francisco North Quadrangle*, *California,* United States Geological Survey, Professional Paper 782, Washington, D.C., 1974, Plate 1, map scale 1:24 000

10. Water - Would the project:	Yes	No	Discussed
a. Substantially degrade water quality, or contaminate a public water supply?	___	X	X
b. Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?	___	X	X
c. Cause substantial flooding, erosion or siltation?	___	X	X

Water Quality

The project would not substantially degrade water quality or contaminate a public water supply. All sanitary wastewater from the proposed buildings and stormwater runoff from the project site would be collected and treated at the Southeast Water Pollution Control Plant prior to discharge to San Francisco Bay. Treatment would be provided pursuant to the effluent discharge limitations set by the Plant's National Pollutant Discharge Elimination System (NPDES) permit. See pp. 22-23 for a discussion of sewer and treatment plant capacity. See "Flooding, Erosion, and Siltation" below for a discussion of water quality during construction.

Groundwater Resources

The project would include excavation to about 25 feet in depth in order to accommodate two levels of proposed underground parking. Dewatering could be required. Any groundwater encountered during construction would be subject to the San Francisco Industrial Waste Ordinance (Ordinance No. 199-77), which requires that groundwater meet specified standards before being discharged into the sewer system. The Bureau of Environmental Regulation and Management of the San Francisco Public Utilities Commission would be notified if the project were to require dewatering.

Should dewatering be necessary, the final foundation study for the project would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the foundation study would contain a determination as to whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the San Francisco Building Code) be retained by the project sponsor to perform this monitoring. Groundwater monitoring wells and/or instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor. The project would include mitigation measures to reduce the potential water quality effects of dewatering (see p. 47).

Flooding, Erosion, and Siltation

The project site is almost entirely paved or covered by structures; therefore, the project would not substantially affect the area of impervious surface at the site or alter site drainage. Project-related wastewater and storm water would continue to flow to the combined sewer system. During construction, requirements to reduce erosion would be implemented pursuant to California Building Code Chapter 33, Excavation and Grading. During operations, the project would comply with all local wastewater discharge requirements. The project would include a mitigation measure to reduce the potential water quality effect of sedimentation (see p. 47).

Based on the above discussion, the EIR will not include further analysis of hydrology and water quality issues.

11. Energy/Natural Resources - Would the project:	Yes	No	Discussed
a. Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	___	X	X

b. Have a substantial effect on the potential use, extraction, or depletion of a natural resource? ___ X X

Energy Use

The project includes new office space, new retail space, and new parking areas. Development of these uses would not result in use of large amounts of fuel, water, or energy. The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations enforced by the Department of Building Inspection. For this reason, it would not cause a wasteful use of energy.

In 1996, the City and County of San Francisco consumed approximately 5,000 gigawatt-hours (GWh) of electricity annually and approximately 27,000,000 million British thermal units (MMBtu) of natural gas annually./1/, /2/ Electricity demand state-wide and in the City tends to grow at approximately 1% to 2% per year./3/ Natural gas consumption is expected to grow similarly but actually peaked for San Francisco in 1989 at approximately 32,000,000 MMBtu and has not yet returned to that level. No energy shortages exist at this time in the State of California.

A forecast of electricity and natural gas consumption of the project is presented in Table 2. Table 2 shows that electricity demand would be approximately 29 GWh, and natural gas demand would be 33,500 MMBtu. This forecast is of energy consumption during occupied operation of the buildings. Additional energy would be consumed during construction of the proposed project and by transportation of the workers to and from the development. Because the project would comply with the energy efficiency regulations of Title 24, it would not be considered to use energy wastefully. Based on this evaluation, no substantial environmental effects are expected from the proposed project, and energy consumption will not be discussed further in the EIR.

Natural Resource Use

Other than natural gas and the coal fuel used to generate the electricity for the project, the project would not use substantial quantities of other non-renewable natural resources. Therefore, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource, and this topic is not required to be further analyzed in the EIR.

TABLE 2
FORECAST OF ANNUAL OPERATIONAL ENERGY CONSUMPTION

Land Use	Building Floor Area (gsf)	Electricity Consumption Factor (kWH/gsf-yr) /1/	Annual Electricity Consumption (1,000 kWh)	Natural Gas Consumption Factor (cf/gsf-yr) /1/	Annual Natural Gas Consumption (MMBtu)
Office	1,120,000	23.05	25,800	26.84	31,500
Retail	56,000	8.51	470	5.08	300
Parking /2/	305,000	8.80	2,700	5.36	1,700
TOTAL			**29,000**		**33,500**

Notes:
gsf = gross square feet
kWH = kilowatt hour
cf = cubic feet
MMBtu = million British thermal units

1. Based on unpublished commercial model data from California Energy Commission, July 1995 forecast. Information provided by Richard Rohrer, Assistant Chief Forecaster, California Energy Commission, July 17, 1997.
2. For parking areas, assume equivalent electric and natural gas consumption factors for non-refrigerated warehouses.

NOTES: Energy/Natural Resources

1. One standard cubic foot of natural gas has an equivalent heating value of approximately 1,050 British thermal units (Btu's). One gigawatt-hour (GWh) is equal to one million kilowatt-hours (10^6 kWh).

2. Andrea Gough, Demand Analysis Office, Energy Forecasting & Planning Division, California Energy Commission, memorandum to EIP Associates, July 25, 1997.

3. California Energy Commission, *Critical Changes: California's Energy Future, The California Energy Plan*, 1997.

12. Hazards - Would the project:	Yes	No	Discussed
a. Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?		X	X
b. Interfere with emergency response plans or emergency evacuation plans?		X	X
c. Create a potentially substantial fire hazard?		X	X

Public Health Hazards and Hazardous Materials

Hazardous Materials Use. Regarding the potential for public health hazards, the project would involve the development of offices and supporting uses that would require relatively small quantities of hazardous materials for routine business purposes. The development would likely handle common types of hazardous materials, such as paints, cleaners, toners, and solvents. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers that handle hazardous materials, and adequately training workers. For these reasons, hazardous materials use in offices and supporting businesses are not typically considered to pose any substantial public health or safety hazards related to hazardous materials.

The greatest volume of hazardous material expected at the project site would be fuel stored in above-ground storage tanks to power emergency generators. The San Francisco Department of Public Health would oversee the design, installation, and operation of these fuel storage tanks. Regulations require provisions to contain possible spills. The Bay Area Air Quality Management District would oversee potential air emissions from testing the emergency generators. As a result of this regulatory oversight and required leak prevention and control measures, the presence of fuel on site for emergency purposes would not be considered to pose any substantial public health or safety hazards.

Soil and Groundwater. Historical activities at the project site and in its vicinity have resulted in the release of contaminants into soil and groundwater. Phase I Environmental Site Assessments have been prepared for the properties that comprise the site, with the exception of a small portion of Area 2 at 224 and 236 Fremont Street./1/ The Phase I investigations list current and past operations, review environmental agency databases and records, report site reconnaissance observations, and summarize potential contamination issues that warrant further investigation. A preliminary Phase II Environmental Site Assessment has been prepared for portions of Areas 1 and 2./2/ The preliminary Phase II investigation reports laboratory test results for limited soil and groundwater sampling at these parcels. The information available in the Phase I and preliminary Phase II studies is summarized by parcel in Table 3. The project site does not appear on the *State of California Hazardous Waste and Substances Sites List*, but some nearby properties, such as 150 First Street and 175 Natoma Street, appear on the list as a result of underground storage tanks that have leaked./3/ These leaks do not appear to have affected conditions at the project site./4/

Between 1854 and 1891 the San Francisco Gas Light Company operated a coal gasification facility at the project site, as indicated in Table 3. The facility included a gas holder, a tar kettle, and gas purifying operations, and covered a substantial portion of the site, particularly Area 1 and the northern portion of Area 2. Other early uses of the site included foundry and smelting operations. Historic uses at Areas 3 and 4 tended to be less industrial than those at Areas 1 and 2./5/

In the early 1900s, much of the project area was filled with debris from the 1906 San Francisco Earthquake and the fire that followed. Fill material from this period often contains elevated levels of various metals, petroleum hydrocarbons, and polynuclear aromatic hydrocarbons. These substances were detected in soil samples collected at the site./6/ Preliminary sampling has identified metals (particularly lead) in some soil samples at

TABLE 3
HISTORIC USES OF THE PROJECT SITE AND EXISTING SITE CONDITIONS

Area	Historic Uses /1/		Existing Site Conditions
1	1887	Coal gasification, gas purification (tar kettle & gas holder), ammonia manufacturing	*Soil and Fill:* Contains metals, petroleum hydrocarbons (as creosote), polynuclear aromatic hydrocarbons, and volatile organic compounds. The highest concentration of polynuclear aromatic hydrocarbons is in what is apparently one large piece of possible coal tar residue.
	1899	Brass foundry, iron foundry	
	1913	Boiler works, pump and compressor manufacturing, scrap metal storage	
	1949	Gas station, ship service shop	*Groundwater:* Contains chromium, cyanide, halogenated volatile organic compounds (including trichloroethylene), volatile petroleum hydrocarbons (including benzene and xylenes). Some contaminants exceed maximum contaminant levels for drinking water, but none have been detected above San Francisco Public Utilities Commission sanitary sewer discharge limits (therefore groundwater pumped from the site could be discharged to the combined sewer system).
	1970	Gas station	
	1971	No gas station	
	Present	Parking, clothing manufacturing, warehouses, offices	
			Building Materials: Former underground storage tanks are present. Asbestos is likely. Polychlorinated biphenyls and lead-based paint are possible. Other hazardous materials may be present.
			Neighboring Sites: A release occurred at the nearby Transbay Terminal. Volatile organic compounds there, including trichloroethylene and vinyl chloride, have not been addressed, but there is little potential for contamination at the project site, which is cross-gradient to the Transbay Terminal./2/
2	1887	Gas purification, foundry, smelting, lead and shot works, spring works, iron works, machine shop	*Soil and Fill:* Contains metals, petroleum hydrocarbons (as creosote, motor oil, kerosene, and diesel), polynuclear aromatic hydrocarbons, and volatile organic compounds. Metals (primarily lead) exceed hazardous waste criteria.
	1899	Foundry, smelting, refining, lead and shot works, machine shop, millwright works, iron works	
	1913	Foundry, smelting, lead and shot works, machine shop, iron works	*Groundwater:* Contains chromium, cyanide, halogenated volatile organic compounds (including trichloroethylene). Some contaminant concentrations exceed maximum contaminant levels for drinking water, but none have been detected above San Francisco Public Utilities Commission sanitary sewer discharge limits.
	1949	Welding, machine shop, plating, clothing manufacturing, battery service	
	1970	Clothing manufacturing, ink manufacturing, machine shop	
	Present	Parking, clothing manufacturing, warehouses, offices	*Building Materials:* Former underground storage tanks could be present. Asbestos is likely. Lead-based paint is possible. Other hazardous materials may be present.

TABLE 3
HISTORIC USES OF THE PROJECT SITE AND EXISTING SITE CONDITIONS (Continued)

Area	Historic Uses /1/		Existing Site Conditions
3	1887	Stores, hotels, residences	*Soil and Fill:* Contains fill from the 1906 earthquake and fire. Similar sites have had elevated levels of petroleum hydrocarbons, coal gas waste, and metals. *Building Materials:* Asbestos is possible. Other hazardous materials may be present. *Neighboring Sites:* A release occurred at the nearby Transbay Terminal. Volatile organic compounds there, including trichloroethylene and vinyl chloride, have not been addressed, but there is little potential for contamination at the project site, which is cross-gradient to the Transbay Terminal.
	1899	Machine shop, hotels, residences	
	1913	Metal works, machine shop, chemical company, printing, lithography, linotype, plumbing, carpentry	
	1949	Machine shop, printing, lithography, linotype, garment factory	
	1970	Printing, lithography, linotype, garment and luggage factories	
	Present	Parking, cash register sales and service, software sales, furniture assembly & repair	
4	1887	Restaurant, hotel, school, residences	*Soil and Fill:* Contains fill from the 1906 earthquake and fire. Similar sites have had elevated levels of petroleum hydrocarbons, coal gas waste, and metals. *Building Materials:* Asbestos is possible. Other hazardous materials may be present. *Existing Operations:* Graphic Arts Engraving is a generator of small quantity hazardous waste (i.e., silver metal sludge). Its Hazardous Materials Management Plan reports up to 130 gallons of hazardous liquids (i.e., photographic developers and fixers) on site at any one time. No releases have been reported.
	1899	Machine shop, fence company work shop, restaurant, hotel, school, residences	
	1913	Garage	
	1949	Printing shop, garage	
	1970	Engraving, parking	
	Present	Engraving, parking, offices, printing & photography	

Notes:

1. Historic uses were determined primarily by examining historic Sanborn fire insurance maps.
2. Groundwater at the Transbay Terminal is believed to flow northeast, whereas the project site is located southeast of the Transbay Terminal. Groundwater contaminants at the Transbay Terminal would be expected to flow in the direction of the groundwater flow and not toward the project site.

Sources: EIP Associates.

Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999.

Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 1, 35 and 39 Natoma Street, 168 First Street, 500 and 546 Howard Street, San Francisco, California*, March 18, 1998.

Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 2, 204, 210, and 228 First Street, 501 through 509 Howard Street, San Francisco, California*, March 12, 1998.

Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 6, 172 Fremont Street, 400 Howard Street, San Francisco, California*, March 19, 1998.

concentrations that exceed hazardous waste criteria./7/ Black, glass-like material containing polynuclear aromatic hydrocarbons apparently exists at Area 1./8/ This material, possibly coal tar residue, likely resulted from the coal gasification plant located at Area 1 in the 1800's. In some groundwater samples, concentrations of chromium, benzene, trichloroethylene, dichloroethene, vinyl chloride, and cyanide exceed maximum contaminant levels for drinking water (although water at the site is not used for drinking purposes)./9/

Project plans call for the excavation and removal of roughly 170,000 cubic yards of soil from the project site. If contaminated areas at the project site were to be excavated, contaminated soil or groundwater could be encountered. Without appropriate safeguards, earth-moving activities could potentially expose workers and possibly the public to chemical compounds in soils, soil gases (gases or vapors, mostly air, trapped within soil), or groundwater. Exposure would most likely occur through skin contact or inhalation. Workers directly engaged in on-site activities would face the greatest potential for exposure to contaminants. The public could also be exposed if access to the construction site were insufficiently controlled. Hazardous materials exposure could cause various short-term or long-term health effects specific to each chemical present at the site if present in sufficient concentration and duration.

Area 1 was historically part of San Francisco Bay; therefore, it is subject to Article 20 of the San Francisco Public Works Code (the Maher Ordinance). The Maher Ordinance requires that applicants for building permits within certain areas (largely the part of San Francisco created by landfill) prepare a site history and analyze the site's soil for hazardous wastes. The analysis is required if more than 50 cubic yards of soil are to be disturbed and the project is either on fill or at a location designated for investigation by the Department of Public Works. Where the analysis reveals the presence of hazardous wastes, the ordinance requires site mitigation pursuant to the standards, regulations, and determinations of local, state, and federal regulatory agencies. Site mitigation is to involve the removal of hazardous substances and their disposal at an approved disposal site, or other appropriate actions.

The proposed project could disturb roughly 42,000 cubic yards of soil at Area 1, and in compliance with the Maher Ordinance, a site history report and site investigation report would be prepared for the parcel. Where hazardous wastes exceed local, state, or federal standards, a Site Mitigation Plan would be submitted to appropriate agencies, including the San Francisco Department of Public Health. The Site Mitigation Plan would be prepared prior to obtaining a building permit. Where toxic materials are found for which no standards have been established, a determination would be sought from appropriate agencies as to whether a Site Mitigation Plan would be needed. In accordance with the Maher Ordinance, the construction contractor would handle and dispose of excavated soils properly, employ worker health and safety and dust control procedures, and have a State Registered Professional Geologist or Engineer certify, at the completion of foundation activities, that all elements of the Site Mitigation Plan have been performed in compliance with the Maher Ordinance.

The Maher Ordinance does not apply to Areas 2, 3, or 4. Soil and groundwater contaminants at these locations would need to be characterized to ensure that appropriate plans are implemented for soil and groundwater handling. Any contaminated soil and groundwater disturbed at the site would need to be managed appropriately, and residual risks to future occupants of the site would need to be kept within acceptable levels as determined by the San Francisco Department of Public Health and other appropriate oversight agencies. Unless soil and groundwater management plans are adequately prepared and implemented, the project could pose a significant impact by potentially creating a substantial human health hazard or involving the disposal of materials in a manner that poses substantial hazards.

The project includes a mitigation measure to characterize soil and groundwater conditions on Areas 2, 3, and 4, by preparing Phase I and Phase II Environmental Site Assessments. If the Phase I or Phase II reports concluded that existing soil and groundwater conditions would pose significant human health or safety hazards, a Site Safety and Health Plan would need to be prepared pursuant to California Division of Occupational Safety and Health (Cal-OSHA) requirements and National Institute for Occupational Safety and Health guidance to ensure worker safety./10/ Under Cal-OSHA requirements, the Site Safety and Health Plan would need to be prepared prior to initiating any earth-moving activities at the site. The Plan would contain policies and procedures to protect site workers from potential health and safety impacts related to contaminated soil and groundwater. The Plan would apply to all site activities through the completion of earthwork construction. It would include specific training requirements and personal protection equipment for on-site workers. With regard to public safety and health, the Site Safety and Health Plan is not required to include measures to minimize the potential for public exposure. A mitigation measure is included to minimize potential public exposure (pp. 47-49).

Building Materials. Existing buildings at the project site could contain hazardous materials, such as asbestos, polychlorinated biphenyls, lead, mercury, or other hazardous materials. In the past, asbestos, polychlorinated biphenyls, and lead were commonly installed in insulation, floor tiles, roofing tar, electrical transformers, fluorescent light ballasts, and paint. Mercury is common in electrical switches and fluorescent light bulbs. If such hazardous materials exist in buildings to be demolished, they could pose hazards to workers, neighbors, or the natural environment. However, the project includes a mitigation measure (see pp. 47-49) intended to reduce to the potential health risks associated with building materials containing asbestos, polychlorinated biphenyls, lead, mercury, or other hazardous materials by securing the investigation, removal, and disposal of these materials prior to demolition of the buildings.

The measure would ensure compliance with existing regulations applicable to the management of any potentially hazardous building components. For example, the BAAQMD regulates airborne asbestos and is to be notified ten days in advance of any proposed demolition. It randomly inspects asbestos removal operations. The California Division of Occupational Safety and Health is also to be notified of asbestos abatement operations. It oversees requirements placed on asbestos abatement contractors whenever asbestos-related work involves 100 sq. ft. or more of asbestos-containing material. Because buildings constructed prior to 1979 are assumed to contain lead-based paint, demolition activities involving lead-based paint are to comply with Chapter 36 of the *San Francisco Building Code*. The ordinance requires that containment barriers be at least as protective of human health and the environment as those in the most recent *Guidelines for Evaluation and Control of Lead-Based Paint Hazards* promulgated by the U.S. Department of Housing and Urban Development./11/ Polychlorinated biphenyls are regulated under the federal Toxic Substances Control Act of 1976, and mercury is regulated as a hazardous waste. These existing laws and regulations would help to ensure the health and safety of workers, neighbors, and the natural environment.

Emergency Response Plans

The project sponsor would develop an evacuation and emergency response plan in consultation with the Mayor's Office of Emergency Services to ensure coordination between San Francisco's emergency planning activities and the project sponsor's plan to provide for building occupants in the event of an emergency. The project sponsor's plan would be reviewed by the Office of Emergency Services and implemented before the Department of Public Works issued final building permits.

Fire Hazards

The project would be required to comply with the San Francisco Fire Code, which contains specifications for fire prevention measures such as fire extinguishing systems, emergency exits/routes, and storage of hazardous materials. Therefore, the project would not create a potentially substantial fire hazard.

Potential health and safety issues related to potentially contaminated building components, contaminated soil and groundwater, and future use of hazardous materials on site would be reduced to less-than-significant levels, with implementation of the mitigation measures identified on pp. 47-49 that are included in project development. Therefore, these issues do not require further analysis and will not be discussed in the EIR.

NOTES: Hazards

1. (a) Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999.

(b) Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 1, 35 and 39 Natoma Street, 168 First Street, 500 and 546 Howard Street, San Francisco, California*, March 18, 1998.

(c) Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 2, 204, 210, and 228 First Street, 501 through 509 Howard Street, San Francisco, California*, March 12, 1998.

(d) Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 6, 172 Fremont Street, 400 Howard Street, San Francisco, California*, March 19, 1998.

2. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999.

3. California Department of Toxic Substances Control, *State of California Hazardous Waste and Substances Sites List*, April 1998, pp. 211-216.

4. (a) Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999, pp. 23, 24, and 42.

   (b) Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 1, 35 and 39 Natoma Street, 168 First Street, 500 and 546 Howard Street, San Francisco, California*, March 18, 1998, p. 7.

   (c) Treadwell & Rollo, *Phase I Environmental Site Assessment, Site 6, 172 Fremont Street, 400 Howard Street, San Francisco, California*, March 19, 1998, p. 7.

5. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999, pp. 21, 22, and 42.

6. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999, pp. 17, 35-39, and 42.

7. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999, pp. 36, 37, and 43.

8. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999, pp. 37 and 44.

9. Erler & Kalinowski, Inc., *Phase I and Preliminary Phase II Environmental Site Assessment Report for Fritzi of California Properties, First & Howard Streets, San Francisco, California*, March 26, 1999, pp. 39-41 and 44.

10. California Code of Regulations, Title 8, Section 5192, "Hazardous Waste Operations and Emergency Response."

    National Institute for Occupational Safety and Health, U.S. Occupational Safety and Health Administration, U.S. Coast Guard, and U.S. Environmental Protection Agency, *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities*, U.S. Department of Health and Human Services Publication No. 85-115, October 1985.

11. U.S. Department of Housing and Urban Development, *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,* June 1995 (Chapter 7 revised 1997).

13. Cultural - Would the project:	Yes	No	Discussed
a. Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	___	X	X
b. Conflict with established recreational, educational, religious or scientific uses of the area?	___	X	___
c. Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	To Be Determined		

Archaeological Resources

Archeo-Tec Consulting Archaeologists completed an archival cultural resources evaluation of the project vicinity for potential subsurface historic or pre-historic resources and to document the history of the area./1/ Potential for the existence of subsurface cultural resources of the prehistoric/protohistoric period (c. 4000 B.C. - A.D. 1775), Spanish/Mexican and Early American era (1776-1848), and the Gold Rush and Later 19th Century eras (1849-c. 1906) were systematically examined.

The project site existed in a natural state as sand hills adjacent to or partially submerged by the original western shoreline of the San Francisco Bay, until landfill and grading of the area in the late 1850s. The Gold Rush-era community of Happy Valley was bordered to the south by First and Howard Streets. Happy Valley was originally a tent city on the outskirts of the city of Yerba Buena, now known as San Francisco. By the late 1850s, the project area had been greatly changed. The project site and surrounding areas had been graded and paved to give rise to industrial uses in the area. Industrial facilities at or adjacent to the project site included the San Francisco Gas Works (predecessor to Pacific Gas & Electric Company), Union Ironworks, the Vulcan Foundry, the Eagle Iron Works, and the Pacific Iron Foundry. South of Market industrial facilities such as these were central to the City's economic prosperity in the second half of the 19th century. A local landmark, the Selby Shot Tower, a 200-foot-tall tower named for Thomas Selby (mayor of San Francisco from 1869 to 1871), stood on the project site at the southeast corner of First and Howard Streets from 1864 to 1904. The Earthquake and Fire of 1906 consumed the South of Market area, including the project site. After 1906, the project site and its immediate surroundings began to assume the essential architectural and demographic contours that have characterized the region throughout the remainder of the 20th century. The project site is now characterized by warehouse, office, and retail outlet uses near the Transbay Terminal; buildings on or adjacent to the project site represent a variety of 20th century architectural styles, including early 20th century industrial, Art Deco, eclectic revival styles, and modern commercial.

While there is no record of significant resources of the prehistoric period, the area "should be considered as a zone of potential sensitivity with respect to the possible existence of significant prehistoric/protohistoric subsurface cultural resources."/2/ A significant prehistoric archaeological deposit, previously unrecorded, was recovered in 1986 about two blocks north of the project site, at the southwest corner of Stevenson and Ecker Streets. This discovery was made at a site with a similar natural environmental setting as the proposed project site. Two additional previously unrecorded prehistoric sites have been encountered within a one-half mile radius of the proposed project site.

Prior to the Gold Rush era, there is no historical record of settlement or occupation on the project site and records indicate that the area remained in its natural state, as noted above. As a result, historic cultural resources from the Spanish/Mexican and Early American era (1776-1848) would not likely be encountered at the project site.

There is no record of subsurface cultural resources from the Gold Rush period found at the project site. However, as the borders of Happy Valley were at approximately First and Howard Streets, the project site may be a sensitive area for remains from the Gold Rush-era, encountered as deeply buried deposits. Such remains have been uncovered near the project site, near the northwest corner of First Street and Minna Street. Historical sources do not indicate past or recent evidence of Gold Rush-era ship hulks or related maritime cultural resources in the project vicinity.

As the project site and vicinity were consumed by the Earthquake and Fire of 1906, potential for the discovery of archaeological remains of the Late 19th Century era is low but cannot be entirely discounted.

The proposed project may include excavating the project site to a depth of 25 feet to accommodate foundations and subsurface parking facilities. Based upon archival evidence, the proposed project may disrupt or adversely affect prehistoric resources or historic archaeological resources from the Gold Rush era. The project includes a mitigation measure (see pp. 49-50) that is intended to reduce the potential impact to cultural resources to a less-than-significant level. Archaeological resources will not be discussed further in the EIR.

Historic Architectural Resources

The project site and vicinity include structures identified as historic architectural resources by the San Francisco Planning Code and other surveys. 231 First Street, the old Thomson Machine Works Building, is listed as a Category I building under Article 11 of the Planning Code, the highest rating for architectural resources. The proposed project would retain and rehabilitate this building. 401 Howard Street and 218 Fremont Street, located on Area 2, are considered eligible or potentially eligible, respectively, for the National Register of Historic Places. Demolition of these two structures, as proposed by the project, may be a significant effect.

Architectural resources and potential effects of the project will be evaluated in the EIR. The EIR will also summarize architectural surveys and evaluations completed for the site and vicinity to include City Planning Code Article 10 and Article 11 listings, the Embarcadero Freeway/Terminal Separator Replacement EIR/EIS Section 106 process, and Transbay Area planning. If appropriate, mitigation measures related to the loss of architectural resources will be discussed in the EIR.

NOTES: Cultural

1. Archeo-Tec, *Archival Cultural Resources Evaluation of the Proposed First and Howard Development Project*, City and County of San Francisco, California, January 1999.

2. Archeo-Tec, *Archival Cultural Resources Evaluation of the Proposed First and Howard Development Project*, City and County of San Francisco, California, January 1999.

C. OTHER

	Yes	No	Discussed
Require approval of permits from City Departments other than Department of City Planning or Bureau of Building Inspection or from Regional, State or Federal Agencies?	X		

A list of approvals and permits necessary for the project is presented in the project description on p. 6.

D. MITIGATION MEASURES

	Yes	No	N/A	Discussed
1. Could the project have significant effects if mitigation measures are not included in the project?	X			X
2. Are all mitigation measures necessary to eliminate significant effects included in the project?	X			X

Noise

1. If pile driving is necessary to install pile foundations, the project sponsor would require construction contractors to predrill holes to the maximum depth feasible on the basis of soil conditions. Contractors would be required to use construction equipment with state-of-the-art noise shielding and muffling devices. The project sponsor would also require that contractors schedule pile driving activity for times of the day that would be consistent with the Noise Ordinance.

Air Quality / Climate

2. The project sponsor would require its contractors to implement as appropriate the BAAQMD's guidelines on basic control measures for emissions of dust during construction: (1) water all active construction areas at least twice daily; (2) cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least two feet of freeboard; (3) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas; (4) sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas; (5) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Geology / Topography

3. The project sponsor would ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors any adjacent buildings for damage during construction, if recommended by the geotechnical engineer, in the foundation investigations.

4. If dewatering were necessary, the final foundation report would address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the foundation report would determine whether or not a lateral movement and settlement survey would be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the San Francisco Building Code) be retained by the project sponsor to perform this monitoring. Instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor.

   If dewatering were necessary, the project sponsor and its contractor would follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering.

5. The project sponsor and its contractor would follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems would be modified as necessary in the event that substantial movements are detected.

Water Quality

The project sponsor would ensure that groundwater from site dewatering and stormwater runoff meets the discharge limitations of the City's Industrial Waste Ordinance by carrying out the following:

6. If dewatering were necessary, the project sponsor would follow the recommendations of the geotechnical engineer or environmental remediation consultant, in consultation with the Bureau of Environmental Regulation and Management of the San Francisco Public Utilities Commission, regarding treatment, if any, of pumped groundwater prior to discharge to the combined sewer system.

   If dewatering were necessary, groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the San Francisco Public Utilities Commission to reduce the amount of sediment entering the combined sewer system.

7. The project sponsor would require the general contractor to install and maintain sediment traps in local storm water intakes during construction to reduce the amount of sediment entering the combined sewer system, if this were found to be necessary by the Bureau of Environmental Regulation and Management of the San Francisco Public Utilities Commission.

Hazards

8. In addition to local, state and federal requirements for handling soil and groundwater containing designated levels of chemicals, the project sponsor would enter into a voluntary remedial action agreement with the Department of Public Health pursuant to Health and Safety Code Section 101480 et seq. At a minimum, the project sponsor would undertake the following work and any additional requirements imposed by the Department of Public Health under the agreement.

   a. A Phase I Environmental Site Assessment would be prepared for any portion of the project site for which a Phase I assessment has not already been completed (i.e., 224 and 236 Fremont Street, Assessor's Block 3737, lot 3). The investigation would list current and past uses of the lot, review environmental agency databases and records, report site reconnaissance observations, and summarize potential contamination issues, including any that warrant further investigation. The assessment would be completed by a Registered Environmental Assessor (REA) or a similarly qualified individual prior to initiating any earth-moving activities at the affected portion of the project site.

One or more Phase II Environmental Site Assessments would be prepared for areas of the project site not subject to San Francisco's Maher Ordinance. (This measure is required by law for areas subject to the Maher Ordinance.) On the basis of historical uses and the conclusions of the Phase I Environmental Site Assessments, soil or groundwater samples, or both, would be collected throughout the project site as directed by the site assessment consultant. Sampling would extend at least to depths proposed for excavation. The samples would be analyzed to identify and quantify any contamination. These studies would be completed by an REA or a similarly qualified individual prior to initiating any earth-moving activities at the site.

If findings in the Phase I and Phase II reports result in the preparation of a Site Safety and Health Plan, in addition to measures that protect on-site workers, the Plan would include measures to minimize public exposure to contaminated soils. Such measures would include dust control, appropriate site security, restriction of public access, and posting of warning signs, and would apply from the time of surface disruption through the completion of earthwork construction.

b. Prior to any demolition or excavation at the project site, surveys would be conducted to identify any potentially hazardous materials in existing buildings or building materials. At a minimum, these surveys would identify any asbestos, polychlorinated biphenyls, lead, mercury, or other hazardous materials that would require removal and disposal before demolition. Wherever former site uses or site reconnaissance observations reported in the Phase I Environmental Site Assessments suggest the potential for underground storage tanks or related piping to be present, magnetic surveys or other appropriate surveys would be conducted to locate underground storage tanks. If any are identified, the San Francisco Department of Public Health would determine whether they must be removed or whether they may be closed in place. These surveys would be completed by an REA or a similarly qualified individual.

c. All reports and plans prepared in accordance with Mitigation Measure No. 8 would be provided to the San Francisco Department of Public Health and any other agencies identified by the Department of Public Health. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the project sponsor would submit to the San Francisco Planning Department and the San Francisco Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report would describe the steps taken to comply with the mitigation measure and include all verifying documentation. The report would be certified by an REA or a similarly qualified individual who states that all necessary mitigation measures have been implemented.

Archaeological Resources

9. Given the location and depth of excavation proposed, and the likelihood that archaeological resources would be encountered on the project site, the sponsor has agreed to retain the services of an archaeologist. The archaeologist would conduct a pre-excavation testing program to better determine the probability of finding cultural and historical remains. The testing program would use a series of mechanical, exploratory borings or trenches or other testing methods determined by the archaeologist to be appropriate.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist would submit a written report to the Environmental Review Officer, with a copy to the project sponsor. If the archaeologist determines that further investigations or precautions are necessary, he or she would consult with the Environmental Review Officer, and they would jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional measures would be implemented by the project sponsor and could include a program of on-site monitoring of all site excavation, during which the archaeologist would record observations in a permanent log. The monitoring program, whether or not there are findings of significance, would result in a written report to be submitted first and directly to the Environmental Review Officer, with a copy to the project sponsor. During the monitoring program, the project sponsor would designate one individual on site as its representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources if they are encountered.

If evidence of cultural resources of potential significance were found during the monitoring program, the archaeologist would immediately notify the Environmental Review Officer, and the project sponsor would halt any activities that the archaeologist and the Environmental Review Officer jointly determine could damage such cultural resources. Ground disturbing activities that could damage cultural resources would be suspended for a total maximum of four weeks over the course of construction of each building.

After notifying the Environmental Review Officer, the archaeologist would prepare a written report to be submitted first and directly to the Environmental Review Officer, with a copy to the project sponsor, which would contain an assessment of the potential significance of the find and recommendations for what measure should be implemented to minimize potential effects on archaeological resources. Based on this report, the Environmental Review Officer would recommend specific additional measures to be implemented by the project sponsor. These additional measures could include a site security program, additional on-site investigations by the archaeologist, or documentation, preservation, and recovery of cultural material.

Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration or recovery program is to be conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the Environmental Review Officer for review. Following approval by the Environmental Review Officer, copies of the final reports would be sent by the archaeologist directly to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. Three copies of the final archaeology reports would be submitted to the Environmental Review Officer, accompanied by copies of the transmittals documenting its distribution.

E. ALTERNATIVES

The EIR will discuss several alternatives to the proposed project that would reduce or eliminate any significant environmental effects. The alternatives will include the following:

1. No Project

2. Base FAR: reducing office space to the base 6:1 FAR on Areas 1 and 4; and reducing parking in all four buildings to the Planning Code maximum of 7% of total gross floor area as an accessory use, plus replacement for short-term spaces in use on the project site.

3. Preservation: designing Building 2 to incorporate 231 First Street, 218 Fremont Street, and 401 Howard Street in a way that would preserve these known or potential historic architectural resources, while maintaining overall project development at 1,120,000 sq. ft. of office and 56,000 sq. ft. of retail. This alternative would result in the same floor area and building height and bulk for Buildings 1, 3, and 4 as the proposed project, but would result in a taller Building 2 that would have different wind and shadow effects than the proposed project.

4. Reduced Development: substantially reducing office floor area to about 775,000 sq. ft. and retail floor area to about 38,000 sq. ft. in order to reduce associated vehicle trips and meet the Bay Area Air Quality Management District screening-level threshold of 80 pounds per day for NO_x, PM_{10}, and reactive organics. Retail uses would remain on the ground floors of each building, and 231 First Street would be retained.

F. MANDATORY FINDINGS OF SIGNIFICANCE

	Yes	No	Discussed
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?	X		X
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		X	
3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)	X		X
4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?		X	

The project may eliminate important historical architectural resources with demolition of all but one of the existing structures on the project site. The project could contribute to cumulative traffic, transit and air quality impacts in San Francisco and the Bay Area.

F. ON THE BASIS OF THIS INITIAL STUDY:

___ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

___ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers ___, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

_X_ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

3/27/99
Date

Hillary E. Gitelman
Environmental Review Officer
for Gerald G. Green
Director of Planning